UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
Lynchburg Division

In re: ALAN/DUNCAN PROPERTIES, LLC
Debtor(s).

Case Number: 16-61360
Chapter 11

In re: SNYDER & SCHNEIDER
PROPERTY DEVELOPMENT, LLC
Debtor(s).

Case Number: 16-61362
Chapter 11

In re: SNYDER VIRGINIA PROPERTIES, LLC
Debtor(s).

Case Number: 16-61364
Chapter 11

AMENDED MOTION FOR AN ORDER
AUTHORIZING EMPLOYMENT OF ATTORNEY

COMES NOW, the Debtor(s), Alan/Duncan Properties, LLC ("ADP"), Snyder & Schneider Property Development, LLC ("SSPD"), and Snyder Virginia Properties, LLC ("SVP"), and move this honorable court for an order authorizing the employment of Edward Gonzalez, Esq., as attorney for the Debtor(s) in the Chapter 11 case(s).

In support of this Motion, the Debtor(s) shows and represents as follows:

1. On July 6, 2016, the Debtor(s), SSPD and ADP, filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. On July 7, 2016, the Debtor, SVP, filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor(s) have remained in possession of their assets and are now operating their financial affairs as Debtor(s) in Possession.

2. The Debtor(s) have retained Edward Gonzalez, Esq., to represent them in carrying out their duties under the Bankruptcy Code.

3. The Debtor(s) propose to employ the attorney for the following purpose:

a. to serve as lead counsel in this matter.

b. to represent the Debtor(s) in their Chapter 11 case and to advise the Debtor(s) as to their rights, duties and powers as Debtor(s) in Possession.

c. to prepare and file all necessary statements, schedules, and other documents and to negotiate and prepare one or more plans of reorganization for the Debtor(s);

d. to represent the Debtor(s) at all hearings, meetings of creditors, conferences, trials, and other proceedings in this case; and

e. to perform such other legal services as may be necessary in connection with this case.

4. The Debtor(s) have made a careful and diligent inquiry and are satisfied that the attorney is qualified and competent to represent the Debtor(s) in this case for the following reasons:

a. The attorney has prepared and filed the petition and related documents initiating this Chapter 11 case; and

b. The attorney is admitted to practice before this court, and is experienced in bankruptcy practice and Chapter 11 proceedings.

5. The Debtor(s) have entered into a written employment agreement with the attorney dated July 5, 2016, with respect to the services to be performed by the attorney and the compensation to be paid to the attorney. A copy of the retainer agreement is attached to this application and the Debtor(s) propose to compensate the attorney as provided in the agreement, subject to the approval of the court after the rendering of such services. **The retainer agreement provides for payment of one $20,000 initial retainer fee toward legal services for all three of the related debtors which comprise the Cutalong real estate development project: Alan/Duncan Properties, LLC ("ADP"), Snyder and Schneider Property Development, LLC ("SSPD") and Snyder Virginia Properties, LLC ("SVP"). The $20,000 retainer was a voluntary contribution to the Cutalong project by Jeff Snyder, manager and majority owner of the three debtors and paid into the attorney's escrow account on July 6, 2016 (prior to the filing). Time billed by the attorney and his staff will be divided evenly among the three debtors when the task benefits all three, such as preparation of a plan of reorganization for the Cutalong project, and billed to the individual debtor when the time benefits that particular debtor, such as preparation of that debtor's schedules.**

6. The Debtor(s) are informed and believes that the attorney has no connection with the Debtor(s), creditors, or any other party in interest, or their respective attorneys or accountants. The Debtor(s) are informed and believes that the attorney does not hold or represent an interest adverse to the estate with respect to the matters on which they are employed, and that the employment of the attorney is in the best interests of the estate.

There are no fees owed for pre-petition services by any of the three Debtor(s)s to the applicant attorney. No pre-petition services were performed by the applicant attorney.

7. The appointment of a trustee has not been requested in this case and notice of this application need be given only to the United States Trustee for this district and a hearing need not be held on this application unless promptly requested by the United States Trustee.

Any objections to the proposed employment shall be made in writing, filed with the court, with a copy served on the movant and the parties listed on the Certificate of Service, within 14 days from the date of service of the motion.

WHEREFORE, the Debtor(s) respectfully requests this honorable court to enter an order approving the employment of Edward Gonzalez, Esq. as attorney (lead counsel) for the Debtor(s) in this case.

Date: September 1, 2016 /s/ Jeff Snyder, Manager
Jeff Snyder

Approved:

By: _/s/Edward Gonzalez__
Edward Gonzalez, Esq.
Counsel for Debtor(s)
2405 Eye Street, NW, Suite 1A
Washington, DC 20037
Virginia State Bar No. 39882
(202) 822-4970

Certificate of Service

I hereby certify that on the 1st day of September, 2016 a copy of the foregoing Amended Application for Order Approving Employment of Attorney was sent electronically and by first-class mail postage pre-paid to:

1. US TRUSTEE, MARGARET K. GARBER, FIRST CAMPBELL SQUARE BLDG, 210 FIRST STREET, SUITE 120, ROANOKE, VA 24011
2. CREDITORS PER ATTACHED MATRIX(S)
3. JEFF SNYDER, MANAGER, 200 LAKE FRONT DRIVE, SUITE 103, MINERAL, VA 23117

/s/ Edward Gonzalez